

BASF NORTH WORKS CORRECTIVE ACTION FACILITY- WYANDOTTE, MICHIGAN

ONE-PAGER HEADLINE:

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KEY MESSAGES/TALKING POINTS:

- BASF is preparing a comprehensive remedial design under EPA's lead, in coordination with EGLE, to address immediate concerns of contaminated groundwater migrating offsite to the Detroit River. This remedial design will approach the contamination on a site-wide scale, which differs from past efforts that focused on certain heavily contaminated portions of the site ensuring a more protective future remedy. RCRA has further increased its coordination with GLNPO on the requirements of both programs. This broadened approach will ensure the design and implementation of the remedy will not only address the contaminated groundwater migrating off-site but, will also ensure that the wider cleanup efforts in the Upper Trenton Channel (UTC) will run smoothly in parallel.
- In September 2022, BASF will submit a remedy design to address contaminated groundwater along the entire site shoreline and downgradient perimeter of the site. EPA and EGLE meet with BASF monthly to ensure the submitted design will meet the robust performance objectives of both EGLE and RCRA's program objectives. After RCRA's approval of the design, RCRA will be exploring options to set an expediated implementation schedule in coordination with GLNPO.
- The North Works facility is upriver of the Wyandotte drinking water intake, and recent concerns regarding the level of contamination migrating into the river and the potential impact on the drinking water system have been assessed. Based on the state of Michigan's evaluation, there appear to be no immediate risks to the drinking water system. EGLE has requested increased monitoring to provide additional assurance. The City of Wyandotte received a grant from the Michigan for the drinking water system to add further carbon filtration to remove PFAS and lead.
- An upstream water intake the GLWA (Great Lakes Water Authority) SW, in the Trenton Channel recently reported detections of PFAS. BASF being downstream of this water intake is unlikely to be a contributor to this exceedance.
- Congresswoman Debbie Dingell has engaged with EPA on behalf of her constituents regarding the cleanup status of the contaminated sites in the Riverview and Wyandotte areas on the Detroit River and the potential for redevelopment. Congresswoman Dingell requested EPA appoint a community planner to coordinate across EPA programs on these sites.
- EPA has been providing information to Dingell, her staff, and the Cities about the completed, ongoing, and future site remediation and will continue to do so during the forthcoming UTC Great Lakes Legacy Act sediment dredging project.
- BASF is a partner in the Great Lakes Legacy Act UTC project. EPA's corrective action program and GLNPO closely coordinate on this project to ensure the releases from the BASF North Works site are addressed prior to the UTC project.

BACKGROUND:

- The North Works Facility is a 230-acre operating chemical facility along the UTC of the Detroit River (South of Detroit). Industrial operations have been conducted at the North Works Facility for over one hundred years. Past and current Facility operations consisted of the manufacturing of inorganic bulk commodities, specialty plastics, resins, and pharmaceutical products.

- The Facility originally consisted of marshland associated with the Detroit River; to facilitate site development activities, the marshland was drained and replaced with fill materials. The fill used consisted primarily of chemical waste produced by the on-site chemical manufacturing processes. This has resulted in widespread groundwater contamination that requires management on a site-wide basis. Additionally, complex subsurface infrastructure at the site requires extra attention to site stability in remedial designs.
- A groundwater pump and treat system is in place, which addresses some of the contaminated on-site groundwater. It does not control all the groundwater from venting into the Detroit River.
- BASF completed a RCRA Facility Investigation and prepared a draft Corrective Measures Study (CMS). In 2016, EPA denied the CMS citing, among other things, the inadequate characterization of the stratigraphy and groundwater along the Facility boundaries.
- Additional investigation and study have been completed at the facility. Groundwater is known to be contaminated above the National Primary Drinking Water Regulations Maximum Contaminant Levels and the applicable sections of the Michigan Act 451, Part 201 generic cleanup criteria for groundwater for VOCs, SVOCs, Metals, pesticides, and ph.
- Due to concerns about the on-going, uncontrolled discharge of contaminated groundwater from the North Works facility to the Detroit River, EPA directed BASF to prioritize the shoreline stabilization and control of groundwater. BASF will submit this interim remedy proposal in late 2022.

KEY INFORMATION:

- There is pervasive, significant groundwater contamination at the BASF North Works site. Ongoing concerns regarding the migration of groundwater into the Detroit River are the current cleanup priorities.
- A recent effort to evaluate any potential human health risk to the nearby Wyandotte drinking water system showed no immediate risk. EGLE shared data from the drinking water system for Feb 2022 showing non-detect for PFAS, mercury and VOCs. Additionally a April 2022 memo from EGLE to EPA, concluded, based on hydrologic conditions, contaminant concentrations, and groundwater flow rate, that concentrations of contaminants are not likely to exceed criteria protective of a public drinking water supply in the vicinity of the intake.
- Addressing the ongoing groundwater concerns remains a priority.
- EPA will continue to coordinate with EGLE and GLNPO at this site.

GOALS/NEXT STEPS:

- BASF to submit remedy proposal September 6th, 2022; EPA to evaluate and select remedy in 2022.
- Ongoing coordination with EGLE & GLNPO.

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